

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17-BK 3283-LTS

(Jointly Administered)

Re: ECF Nos. 24191 and 24186.

**This filing relates to the
Commonwealth.**

**MOTION SUBMITTING CERTIFIED TRANSLATION IN CONNECTION WITH THE
OBJECTION OF THE COMMONWEALTH OF PUERTO RICO TO PROOF OF
CLAIM (CLAIM NO. 70324) OF EMPRESAS OMAJEDE, INC. AND TO MOTION FOR
ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM
PURSUANT TO 11 U.S.C. § 503**

To the Honorable United States District Judge Laura Taylor Swain:

The Commonwealth of Puerto Rico (the “Commonwealth”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole representative of the Commonwealth pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”)², hereby respectfully states as follows:

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

1. On May 10, 2023, the Commonwealth filed the *Objection of the Commonwealth of Puerto Rico to Proof of Claim (Claim No. 70324) of Empresas Omajede, Inc. and to Motion for Allowance and Payment of Administrative Expense Claim Pursuant to 11 U.S.C. § 503* [ECF No. 24186] (the “Objection”). In support of the arguments in the Objection, the Commonwealth attached as Exhibits F and G thereto an opinion dated November 15, 2021, issued by the Court of Appeals of Puerto Rico in connection with Case No. KLCE202101045, which is in an uncertified translation into English and in its original Spanish language (the “Opinion”), respectively.

2. On that same day, the Commonwealth filed a motion requesting leave to file the Opinion in the Spanish language and three business days, until May 16, 2023, to provide the Court with a certified English-language translation of the Opinion. *See* ECF No. 24187.

3. On May 11, 2023, the Court entered an order granting the Commonwealth until May 16, 2023, to file a certified translation of the Opinion to the English language. *See* ECF No. 24191.

4. In compliance with the Court’s May 11, 2023 order, attached hereto as **Exhibit A** is a certified translation to the English language of the Opinion.

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WHEREFORE, the Commonwealth respectfully requests the Court take notice of the filing of this certified translation in compliance with the Court's orders.

Dated: May 15, 2023
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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